



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

SR-6J

January 3, 2013

VIA ELECTRONIC MAIL AND CERTIFIED MAIL

Weyerhaeuser Company
Attention: Richard Gay
810 Whittington Ave.
Hot Springs, AR 71902

Re: Plainwell Mill, Operable Unit #7, Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site -- EPA Comments on Remedial Investigation Report, Revision 2, dated October 19, 2012

Dear Mr. Gay:

Pursuant to the Consent Decree for the Design and Implementation of Certain Response Actions at Operable Unit #4 and the Plainwell Inc. Mill Property of the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site (Site), Conestoga-Rovers & Associates, Inc. (CRA), Weyerhaeuser Company's (Weyerhaeuser) environmental consultant, submitted a Remedial Investigation (RI) Report on June 20, 2011 for Weyerhaeuser. A revision to this report, RI Report, Revision 1, was submitted on April 20, 2012 and a subsequent revised RI document was submitted on July 10, 2012 correcting an error regarding the Human Health Risk Assessment. On August 30, 2012, EPA responded with comments to the April 20, 2012 and the June 20, 2012 submittals. A revision to the report, RI Report, Revision 2, was submitted by CRA on October 19, 2012. CRA's responses to EPA's comments on the RI report dated October 19, 2012 were provided in the cover letter of the submittal.

EPA has the following comments on the report:

- The executive summary does not discuss PCBs in soil in the MW-16 area and does not mention the underground tanks encountered at the sludge dewatering building. In addition, the executive summary and Section 5 of the report should discuss the product encountered in the AST delivery line during redevelopment activities.
- Section 5.2.4, Page 84, Paragraph 2: The text should refer to the actual figure numbers for the figures used to compare pre- and post-sewer line installation groundwater flow patterns. In addition, Figure 5.1.2 says "proposed storm sewer" in the legend and the figure should show the actual as-built locations, if available.

- Section 5.4.8, Page 177, Paragraph 3: The text discusses the fuel oil observed in the coal tunnel. The previous section (Section 5.4.7) states that fuel oil releases to the Number 6 Fuel Oil AST Area “have been documented historically”. The text should also include a discussion of the fuel oil encountered in the AST delivery line during the August 2012 redevelopment activities and show the location of the delivery line on a figure. In particular, the text should discuss whether fuel oil releases are isolated or whether a larger area of impacts exists extending from the AST to the coal tunnel and along the delivery line to the former Plainwell Mill building.

EPA comments on the Baseline Human Health Risk Assessment portion of the RI Revision 2 report:

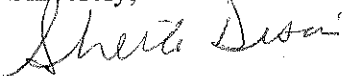
- The response to EPA HHRA General Comment #4, states that Section 8.1.5.4 has been revised to “summarize the segregated hazards as appropriate . . .”. Section 8.1.5.4 has been revised to discuss the basic hazard segregation process and to identify for each exposure area those toxicity endpoints (target organs) associated with cumulative hazard indices (HI) >1 and the associated chemicals of potential concern (COPC). However, the numeric value of each cumulative HI is not identified, nor is the maximum cumulative HI identified. This information is presented in the associated “Risk Assessment Guidance for Superfund” (RAGS) Part D tables in Appendix I and should be presented also in the text. (Note: the incomplete discussion/presentation of segregated hazard results also impacts Section 10.1.3 with regard to EPA HHRA Specific Comment #15 and the executive summary with regard to EPA HHRA General Comment #1).
- The executive summary, Section 8.0 (Baseline Human Health Risk Assessment), and Section 10.0 (including Section 10.1.3 [Human Health Risk Assessment]) do not identify or discuss the impacts of the Michigan Department of Transportation (MDOT) and Michigan Gas Utilities (MGU) utility line installations completed in 2012. Section 5.2.4 of the Revised (Revision 2) RI report has been revised to discuss these installations. However, this section-specific discussion should be summarized or at least referenced elsewhere in the RI, including the HHRA.
- Based on a spot check of the transfer of the RAGS D exposure area- and receptor-specific risk and hazard calculations to the text, a single error was identified. Specifically, in Section 8.1.5.6.2, in the in-text table for the future resident – “disturbed” soil exposure scenario, the cumulative hazard quotient (HQ) for iron in groundwater is presented as “2.0E+01”. However, the correct value is “2.0E+00” as presented in the referenced RAGS D Table I.2.46.RME. This single error indicates that there may be other errors, albeit likely a small number, within HHRA results not addressed in the limited spot-check. Section 8.0, in particular Section 8.1.5.6, should be closely reviewed and the current results verified or corrected as needed.

EPA comments on the Screening Level Ecological Risk Assessment portion of the RI Revision 2 report:

- Section 9.0, Page 315, Paragraph 2. The text states Section 9.4 summarizes the constituents identified as chemicals of potential ecological concern (COPEC) – it should reference Section 9.3, and it should also state that Section 9.4 summarizes the uncertainties associated with the SLERA.
- Section 9.2.2.7, Page 340, Paragraph 2. This paragraph identifies all COPECs with a screening quotient (SQ) greater than 1 and states the SQ for chromium is 1.1, while Table J6 and the previous paragraph identified the SQ for chromium as 0.5. The reference to chromium should be removed from this paragraph.
- Section 9.2.2.8, Page 342, Paragraph 5. The text identifies an SQ for chromium as 2.5, while Table J6 identifies the SQ as 3.3; the text must be revised to be consistent with the table.
- Section 9.2.2.9, Page 344, Paragraph 5. The text identifies the SQs for copper as 71 and iron as 129, while Table J6 identifies the SQs for copper as 1.1 and iron as 71; the text must be revised to be consistent with the table.
- Section 9.2.2.10, Page 346, Paragraph 4. This paragraph identifies all COPECs with a SQ greater than 1 and states the SQ for chromium is 1.1, while Table J6 and the previous paragraph identified the SQ for chromium as 0.54. The reference to chromium should be removed from this paragraph.
- Section 9.2.2.11, Page 348, Paragraph 5. This paragraph identifies all COPECs with a SQ greater than 1 and states the SQ for arsenic is 1.1, while Table J6 identified the SQ as 1.0. The reference to arsenic should be removed from this paragraph and discussed in the previous paragraph.
- Section 9.2.2.12, Page 351, Paragraph 3. To be consistent with the presentations within this section, this paragraph should have the heading “Ecological Considerations” inserted at the beginning.
- Section 10.1.4, Page 374, Paragraph 2. The text identifies eight volatile organic compounds as COPECs, and “a1,3,5-trimethylbenzene,” should be “1,3,5-trimethylbenzene.”

Per the Consent Decree, a revised RI Report that corrects all the deficiencies must be submitted within 30 days of receipt of this letter for review. Please submit a complete electronic copy and change-out pages of the revised pages for the paper copy. If you have any questions or comments regarding this letter, please contact me at (312) 353-4150 or via email at desai.sheila@epa.gov.

Sincerely,



Sheila Desai
Remedial Project Manager

cc: J. Saric, EPA (e-mail)
P. Bucholtz, MDEQ (e-mail)
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